



1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
Telephone: (202) 828-7452

RECEIVED

OCT 20 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Richard D. Lawson
Director
Federal Regulatory Relations
United Telephone Companies

October 20, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

RM-8334

RE: In the Matter of American Telephone and Telegraph Company Petition for the
Establishment of Additional Standards to Govern Study Area Boundary Changes in
Connection with the Transfer of Service Territories Between or Among Local
Exchange Carriers

Dear Mr. Caton:

Attached is the original and four copies of the Comments of the United and Central
Telephone Companies in the matter referenced above.

Sincerely,

A handwritten signature in cursive script that reads "Jay C. Keithley".

Jay C. Keithley
Vice President
Law and External Affairs

Attachment

JCK/mlm

No. of Copies rec'd
List ABCDE

0+4

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

SEP 20 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
 American Telephone and)
 Telegraph Company)
)
 Petition for the Establishment)
 of Additional Standards to Govern)
 Study Area Boundary Changes in)
 Connection with the Transfer of)
 Service Territories Between or)
 Among Local Exchange Carriers)

RM-8334

**COMMENTS OF THE UNITED AND CENTRAL
 TELEPHONE COMPANIES**

The United and Central Telephone Companies ("United") herein respectfully comment on the American Telephone and Telegraph Company ("AT&T") September 3, 1993, Petition for Rulemaking ("Petition"). In the Petition, AT&T claims that the Commission's criteria for assessing requests to change study area boundaries, filed in conjunction with the sale of high cost local exchanges, is insufficient to check the continued growth of the Universal Service Fund ("USF"). AT&T proposes new standards that the Commission should follow in such waiver proceedings and requests that the Commission adopt a rulemaking to consider these standards.

United opposes the adoption of such a rulemaking. On September 14, 1993 the Commission issued a Notice of Proposed

Rulemaking ("NPRM") and referred the general issue of changes in the Part 36 rules governing the USF, including specifically the growth of the USF, to the Federal State Joint Board.¹ AT&T's proposal should be considered in that NPRM proceeding. No separate rulemaking is necessary; to initiate the rulemaking AT&T seeks would at best be redundant and at worst, an administrative burden on the Commission.

Respectfully submitted,

UNITED AND CENTRAL TELEPHONE
COMPANIES

By Jay C. Keithley
Jay C. Keithley
1850 M Street, N.W.
Suite 1100
Washington, DC 20036
(202) 857-1030

Craig T. Smith
P.O. Box 11315
Kansas City, MO 64112
(913) 624-3065


THEIR ATTORNEYS

October 20, 1993

1. In the Matter of Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, CC Docket No. 80-286, Notice of Proposed Rulemaking, FCC 93-435, released September 14, 1993.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 20th day of October, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of the United and Central Telephone Companies" in the Matter of American Telephone and Telegraph Company Petition for the Establishment of Additional Standards to Govern Study Area Boundary Changes in Connection with the Transfer of Service Territories Between or Among Local Exchange Carriers, RM-8334, filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.


Melinda L. Mills

Francine J. Berry
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

ITS*
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Joel Ader*
Bellcore
2101 L Street, N.W., 6th Floor
Washington, D.C. 20037

Kathleen Levitz*
Acting Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

*** indicates Hand Delivery**